

The Great Grid Upgrade

Sea Link

# Sea Link

Volume 9: Examination Submissions

Document 9.116: Applicant's Comments on Selected Other Late Submissions  
Received at Deadline 3

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# 1. About this Document

## 1.1 Purpose of this document

- 1.1.1 This document provides National Grid Electricity Transmission plc's (the Applicant's) comments on other late submissions made by Interested Parties at Deadline 3 on the 09 January, in response to the application for development consent for the Sea Link Project (the Proposed Project).
- 1.1.2 Interested Parties late responses received at Deadline 3 have been reviewed and considered in full. The purpose of this document is to provide the Applicant's comments on new matters or matters which have been expanded upon within Interested Parties late submissions at Deadline 3.
- 1.1.3 Comments received at Deadline 3A regarding the Change Request are provided in **Application Document 9.91 Applicant's Comments on Change Request (CR1) Relevant and Written Representations [REP4-089]**.
- 1.1.4 Some submissions are not responded to again in this document because it is the Applicant's view that all matters raised have been responded to previously, or that no further comments are necessary.

## 1.2 Structure of the Report

- 1.2.1 Table 1.1 below outlines the structure of this document. The Applicant's comments are provided in response to paragraph numbers used in the original submissions, with paragraphs grouped where appropriate for clarity. Where paragraph numbers are missing, this indicates that the point is considered to have been responded to previously.

**Table 1.1 Structure of the Report**

<b>Chapter</b>	<b>Interested Parties</b>	<b>Relevant Submission at Deadline 3</b>
2	Saxmundham Town Council	REP3-134
		REP3-135
3	Suffolk Energy Action Solutions (SEAS)	REP3-141
		REP3-140
		REP3-139
		REP3-138
		REP3-137

## 2. Applicant's Comments on the Late Submissions from Saxmundham Town Council

### 2.1 Introduction

2.1.1 Table 2.1 summarises the Applicant's comments on the Saxmundham Town Council late Deadline 3 submissions [REP3-134 and REP3-135]

**Table 2.1 Applicant's comments on the Saxmundham Town Council late Deadline 3 submissions [REP3-134 and REP3-135]**

Reference	Local Impact Report	Saxmundham Town Council – Comments	Applicant's Comments
<b>Comments on East Suffolk Council's Local Impact Report</b>			
6.1.3	ESC considers the following matter outstanding - restrictions on HGV movements on the A1094 and B1122 via Construction Traffic Management Plan (CTMP) controls	We are concerned that no mention is made to the B1119 and B1121 Saxmundham roads, albeit this issue is extensively raised by Suffolk County Council, with responsibility for highways in their Local Impact Report and Saxmundham Town Council in our Relevant Representation, Open Floor Hearing and Written Responses.	The Applicant has responded to this in Application Document 9.35.1 Applicant's Comments on Suffolk County Council Local Impact Report [REP2-026] and Application Document 9.35.2 Applicant's Comments on East Suffolk [REP2-027].
pp. 72-73	Concerning community benefits - ESC understands that some communities may have their own ideas on how to offset or compensate where impacts are directly linked to the project. It is again important to reiterate that Sea Link is not being developed in isolation - there are multiple other projects proposing compensatory measures so there is potential for NGET to co-ordinate compensation associated with Sea Link with other measures agreed with other project promoters. In this context, ESC draws the ExA's attention to the details contained within the Section 111 agreements with ESC for the SPR East Anglia ONE North and TWO offshore wind farms.	We refer to our Relevant Representation, section 20 and appendix 3, Empowering Nature –Protecting Saxmundham in which we call for ' <i>a bold call for nature-positive infrastructure and locally driven environment enhancement... grounded in local priorities, informed by community consultation, and designed to deliver tangible long-term gains in biodiversity, public access to nature, and community well-being</i> '. Furthermore, we can confirm that we have engaged with Suffolk Wildlife Trust to drive forward the initiative and we will fully participate with all stakeholders, including local parishes and environmental groups.	The Applicant welcomes the engagement undertaken to date with Saxmundham Town Council on their 'Empowering Nature' proposals. The Applicant will continue discussion with the Town Council on the proposals as part of ongoing engagement on Community Benefits.
7.8.8.4	Saxmundham is a traditional rural market town with limited industrial development outside of an existing industrial estate located just north of the town. The proposed converter station is unprecedented in scale and visual impact and has the potential to transform the character of the town.	We agree with ESC and would refer to our comprehensive Relative Representation that presents a full written description of the town and the impacts of the development.	This comment has been noted. A response to the matter raised by East Suffolk Council (ESC) regarding the impact to the high street and businesses and landscape and visual impact is provided in Application Document 9.35.2 Applicant's Comments on Local Impact Report from East Suffolk Council [REP2-027]. The Project Level Design Principles within Application Document 7.12.1 (B) Design Principles – Suffolk [REP4-073] provide guidance and narrative to the design of the Suffolk Onshore Scheme and have been used to inform the Converter Station Design Principles in Table 3.1 which are secured by Requirement 3 of Application Document 3.1 (G) Draft Development Consent

Reference	Local Impact Report	Saxmundham Town Council – Comments	Applicant's Comments
7.8.8.7	<p>High Street economies are fragile, and Saxmundham is dependent on local trade as well as an influx of visitors exploring the Suffolk Coast. Whilst Saxmundham may benefit from a temporary influx of workers during NSIP construction...there are concerns that the legacy for Saxmundham could be one of boom and bust and where the character of the town, its attraction, is permanently changed.</p>	<p>In practice, this assumed temporary economic uplift has not been reflected in Saxmundham's experience to date. Early observational evidence suggests that any increased spend from Sizewell C workers is largely captured by national chains - supermarkets, hotels and takeaways - rather than independent high street traders. Independent businesses report reduced footfall as a result of congestion and parking pressures, and increased traffic discourages regular shoppers from visiting the town centre. These behavioural changes suppress precisely the type of linked trips (supermarket visit followed by independent shopping) that sustain local retail resilience. Without targeted measures that actively support independent businesses, the claimed benefits are unlikely to materialise in Saxmundham.</p>	<p><b>Order</b> submitted at Deadline 4A. The Converter Station Design Principles include the requirement to address height, scale and massing in response to context and to respond to key and strategic views.</p> <p>The Applicant notes the observation regarding early evidence from Sizewell C and acknowledges that patterns of construction worker expenditure may differ by location, phase of works and local retail characteristics. As set out in <b>Application Document 9.73 Applicant's Responses to First Written Questions [REP3-069]</b>, the Applicant recognises that construction workers and tourists have different motivations, behaviours and spending profiles, and that construction worker expenditure may be more strongly focused on accommodation, food and drink and convenience goods, including national chains.</p> <p>The Applicant does not agree that this evidence undermines the conclusion that construction worker spend provides a net benefit to the local economy. Whilst some spend may be captured by national chains, this expenditure will still support local employment and supply chains within the accommodation, food and drink and service sectors. Moreover, construction worker expenditure is regular and sustained across the year and over long durations, providing a stable and predictable source of demand for local businesses, including smaller independent providers, particularly outside peak tourist periods. Additionally, the scale of construction employment associated with the Proposed Project is limited. As such, construction workers are expected to complement rather than displace existing economic activity.</p>

#### Comments on Suffolk County Council's Local Impact Report

Appendices	<p>In relation to supporting documentation, the countywide, Nationally Significant Infrastructure Project - Suffolk Water Recycling, Transfer and Storage Project – is currently at non-statutory stage is planned to commence 2030.</p>	<p>We consider that this project, as referred to in our Written Representation, should be considered in relation to inter-project cumulative impact.</p>	<p>The Suffolk Water Recycling project is acknowledged by the Applicant. Relevant additional cumulative schemes for consideration post submission of the application, including the Suffolk Water Recycling, Transfer and Storage Project, will be considered and assessed, if there is a potential for a cumulative effect to arise within the Proposed Project study area, subject to information being available to allow a meaningful assessment to be carried out.</p>
pp. 141-142	<p>B1119/B1121 Saxmundham Crossroads – Sizewell C data shows this signalised junction is already over the theoretical capacity. Improvements have been made to the signals such as retrofitting MOVA. Local knowledge would support the data with significant delays on a daily basis particularly on the B1119 from the east exacerbated by the presence of the two supermarkets. Although only peak and shoulder hours were assessed there is concern that</p>	<p>We have addressed this and can now add Sizewell C's August 2025 traffic monitoring figures that highlight a 20 percent increase in traffic travelling between Saxmundham and Leiston on the B1119 plus footfall figures into the mix as further evidence.4 SCC notes that there are 'significant delays on a daily basis particularly on the B1119 from the east'. We included photographic evidence on this in our Relevant Representation. 5 Ideally, traffic monitoring should be undertaken to understand the volume of traffic entering Saxmundham.</p>	<p>Additional construction traffic along the B1119 Church Hill will be limited to environmental mitigation and mobilisation works (associated with the eastern abutment of the Fromus Bridge) only, which will be completed over a period of four months early in the programme, with a maximum of 25 vehicles per day. Therefore, the volume of construction traffic entering through Saxmundham will be negligible. Once the new access to the Saxmundham Converter Station and the Fromus Bridge is constructed, all construction traffic will use this access from the B1121 Main Road, avoiding routing through Saxmundham and nearby villages. A full cumulative traffic impact assessment has been undertaken within <b>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]</b>, including</p>

Reference	Local Impact Report	Saxmundham Town Council – Comments	Applicant's Comments
	delays occur throughout the day and therefore should be assessed.		Sizewell C, LionLink, and SPR projects. The assessment concludes no significant cumulative effects on Traffic and Transport receptors. <b>Application Document 7.5.1.1 (C) Outline Construction Traffic Management and Travel Plan – Suffolk [REP4-062]</b> includes defined construction routes and traffic control measures to reduce the potential impacts of construction traffic associated with the Proposed Project.
p. 145	B1119: Saxmundham to Leiston (S-RL7): Narrow road width in Saxmundham. On street parking in Leiston and Saxmundham causing delays. Concern over capacity and delay issues at the signal-controlled crossroads in part associated with two supermarkets in Saxmundham. Surface water flooding issue near the Saxmundham level crossing. Poor road geometry in places along the length of the B1119 with several sharp bends and narrow sections.	In the Open Floor Hearing we raised concerns about traffic impacts in Saxmundham, especially when the Benhall to Saxmundham road is closed. In our Relevant Representation we also raised the issues concerning increased traffic. To briefly reiterate, the B1119 from the A12 to Saxmundham town centre is not a suitable route for construction and construction workers vehicles. This route includes: residential areas, a care home, a nursing home, Memorial Field with children walking, walking route to school on Brook Farm Road, potential SEND provision, a zebra crossing and listed buildings. At places the road is very narrow with weight restrictions and includes, a railway crossing, the traffic light controlled B1119/B1121 crossroads, two major supermarkets, a zebra crossing, two bus stops and is dangerous for pedestrians crossing the road to St John the Baptist Church and Manor Gardens.	No construction vehicles will be travelling from the A12 onto the B1119 Rendham Road through to Saxmundham. Additional construction traffic along the B1119 Church Hill will arrive from/ depart to the A12 via the B1121 Main Road, and will be limited to environmental mitigation and mobilisation works (associated with the eastern abutment of the Fromus Bridge) only, which will be completed over a period of four months early in the programme, with a maximum of 25 vehicles per day. Therefore, the volume of construction traffic entering through Saxmundham will be negligible. Once the new access to the Saxmundham Converter Station and the Fromus Bridge is constructed, all construction traffic will use this access from the B1121 Main Road, avoiding routing through Saxmundham and nearby villages.
p. 155	Key areas of cumulative inter-project impact are considered to be: v. B1121 from A12 to River Fromus Bridge: Sea Link, Lion Link vi. B1121 to Saxmundham and B1119 towards Leiston: Sea Link, Lion Link	Taking into consideration the annual 20% increase in traffic as noted above, the implications of daily twenty-four rail use, we consider that Sizewell C directly impacts Saxmundham and should be added to the projects that affect the B1121 and B1119. Moreover, the Suffolk Water Recycling, Transfer and Storage Project and South Saxmundham Garden Neighbourhood of 800 residential dwellings and associated employment area as noted in our WR should be considered as inter-project impacts	<b>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060]</b> included an assessment of the B1121 and B1119 with Sizewell C. Relevant additional cumulative schemes for consideration post submission of the application, will be considered and assessed if there is a potential for a cumulative effect to arise within the Proposed Project study area, subject to information being available to allow a meaningful assessment to be carried out. Regarding the Suffolk Water Recycling, Transfer and Storage Project, this project is at too early a stage to be able to make assumptions on the design and construction routing to then be considered in relation to inter-project cumulative impacts. Regarding the South Saxmundham Garden Neighbourhood of 800 residential dwellings and associated employment area, this is currently at pre-application Masterplanning and neighbourhood-plan modification stage and therefore also too early a stage to be able to make assumptions on the design and construction routing to then be considered in relation to inter-project cumulative impacts.
pp.167-168 Converter Station Site 11.242	Saxmundham Footpaths 5 and 6 cross the site and require diversion. 11.242 SCC considers that the development and design of the converter station site should include additional opportunities for recreation and other community benefits and should be developed with input from the local communities, through proactive	We refer to our Relevant Representation, section 20 and appendix 3, Empowering Nature – Protecting Saxmundham in which we call for <i>'a bold call for nature-positive infrastructure and locally driven environment enhancement... grounded in local priorities, informed by community consultation, and designed to deliver tangible long-term gains in biodiversity, public access to nature, and community wellbeing'</i> . Furthermore, we can confirm that we have engaged with a wildlife group to drive forward the initiative and fully participate	A full response to the matter raised regarding impacts on Public Rights of Way (PROW) is provided in <b>Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]</b> .  With regard to the Order Limits along the B1119 and allowing enough space for mitigation planting as proposed within <b>Application Document 9.19 Sea Link DCO notification of change to DCO application [AS-138]</b> , it is considered that there is

Reference	Local Impact Report	Saxmundham Town Council – Comments	Applicant's Comments
	<p>engagement with Saxmundham, Benhall and Sternfield.</p> <p>11.243 The strip of land along of the B1119 currently included in the proposed DCO limits, even considering the recent change request by the Applicant, does not appear sufficient to accommodate substantial planting (tree belts) and an additional Public Right of Way that would provide, at least, for example, a circular route from Saxmundham, which also connect to other PRoW in the area. River Fromus Crossing.</p>	<p>with stakeholders, including local parishes and environmental groups.</p>	<p>sufficient space for the proposed hedgerow and occasional hedgerow tree planting. There is a drainage ditch alongside the B1119 which has been factored into the size of the Order Limits along with provision of a double staggered hedgerow with tree planting.</p>
p.203	<p>Suffolk's economic base - especially in rural towns like Saxmundham, Leiston, and Aldeburgh - is made up of mostly small, service-oriented businesses that could benefit from short-term construction activity, particularly if accommodation is sourced locally and worker spend is retained within the community. However, without intervention, these opportunities tend to be minimal and transient and are often captured by larger regional or national supplier.</p>	<p>In practice, this assumed economic uplift has not been reflected in Saxmundham's experience to date. Early observational evidence suggests that any increased spend from Sizewell C workers is largely captured by national chains — supermarkets, hotels and takeaways — rather than independent high street traders. Independent businesses report reduced footfall as a result of congestion and parking pressures, and increased traffic discourages regular shoppers from visiting the town centre. These behavioural changes suppress precisely the type of linked trips (supermarket visit followed by independent shopping) that sustain local retail resilience. Without targeted measures that actively support independent businesses, the claimed benefits are unlikely to materialise in Saxmundham.</p>	<p>A response has already been provided to this issue above (reference 7.8.8.7).</p>
p.214 13.86	<p>The Council is seeking to ensure the accommodation of construction workers and other workers who are not home based is to the benefit of the visitor economy rather than disrupting it. For example, depending on the scheduling of works, utilising accommodation that is available out of season that could complement the tourist season. If this were not to be achieved, the accommodation sector would be unlikely to be able to accommodate both workers and tourists, thus resulting in a reduction in tourist numbers and potentially detrimental impacts on tourist businesses in the region.</p>	<p>While the principle of aligning worker accommodation with seasonal availability is noted, this is only viable if Sizewell C ensures that the majority of non-home-based workers are housed within the dedicated Sizewell C accommodation campus. Failure to do so will place unsustainable pressure on the local private rented sector. In Saxmundham and Leiston, rental prices have risen sharply in recent years, and the arrival of long-term construction workers has the potential to inflate them further, pushing local households out of reach of affordable housing options. Evidence from the current market already shows limited supply and high demand; see Rightmove current listings that illustrate the scarcity and cost of rental accommodation.</p> <p>In addition, the increased use of HMOs for worker accommodation risks creating knock-on impacts in residential neighbourhoods. These include heightened on-street parking pressures - particularly acute in Saxmundham where some rail users already park in residential streets to avoid station charges. Without stringent controls and a firm commitment that the Sizewell C campus will be the default accommodation solution, the visitor economy and local communities will face significant and lasting disruption.</p>	<p>The Applicant notes the Council's concern regarding the potential for adverse impacts on tourist accommodation. <b>Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socioeconomics, Recreation and Tourism [REP1A-005]</b> conducts an assessment to evaluate whether existing hotel, bed and breakfast, inn and private rental accommodation within a 60-minute drive of the Suffolk Onshore Scheme could meet demand from the peak construction workforce. The assessment concludes that there are no significant effects anticipated from the Suffolk Onshore Scheme, and therefore no additional mitigation will be required. <b>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Interproject Cumulative Effects [APP-060]</b> also assesses the cumulative impact of the Proposed Project alongside other NSIPs, on local accommodation capacity. Under a worst-case scenario whereby the peak construction workforces of the cumulative schemes overlap, and all workers require accommodation, the chapter concludes that no significant effects are expected. As a result, no additional mitigation will be required.</p>
			<p>The Applicant is working closely with Sizewell C and SPR to explore ways that current impacts of workers traveling to site and staying in the local area could be minimised. The workers required for the</p>

Reference	Local Impact Report	Saxmundham Town Council – Comments	Applicant's Comments
p.214 13.88 and 13.89	<p>The Council encourages the Applicant to consider community benefit options and would be happy to discuss how community benefits suitable for the locality could be incorporated. Secondary mitigation should be in addition to any community benefits from the development, guided by the government's expectations set out in the Community Funds for Transmission Infrastructure Guidance published by the Department for Energy Security &amp; Net Zero in March 2025. The Council also encourages project promoters to consider legacy opportunities of all elements of their development</p>	<p>We refer to our Relevant Representation section 20 and appendix 3, Empowering Nature – Protecting Saxmundham in which we call for 'a bold call for nature-positive infrastructure and locally driven environment enhancement... grounded in local priorities, informed by community consultation, and designed to deliver tangible long-term gains in biodiversity, public access to nature, and community wellbeing'. Furthermore, we can confirm that we have engaged with a wildlife group to drive forward the initiative and fully engage with stakeholders, including local parishes and environmental groups.</p>	<p>construction of the Proposed Project are more likely to stay in hotels within cities and large towns where they have access to other facilities. The Applicant has had several meetings with Sizewell C, discussing the use of the Park and Ride Facilities being built by SZC, the buses that they are providing for workers from Ipswich Train Station and any future initiatives they are planning.</p>
			<p>The Applicant will follow government guidance which sets expectations for how community benefit funds should be delivered for transmission infrastructure projects such as the Proposed Project. The guidance is clear that community funds are separate from, and should not be a consideration in deciding, the DCO application.</p>
			<p>Therefore, separate to, and outside of the planning process, the Applicant will undertake engagement with local communities and stakeholders in 2026 to understand what is important to them, to inform the development of the community benefit programme for the Proposed Project.</p>
			<p>Ahead of consultation, the Applicant has undertaken socio-economic analysis in Suffolk to understand the potential needs of the respective communities. Together, this research and the forthcoming consultation will help inform the Applicant of local priorities, and guide delivery of community benefit, should the Proposed Project be granted development consent.</p>
			<p>The Applicant recently provided a high-level overview of the planned consultation to local authorities in Suffolk as part of the regular monthly meetings with said authorities. In addition, early discussions have also taken place in 2025 with a small number of stakeholders who have expressed a desire to engage with the Applicant in relation to the delivery of community benefits.</p>
			<p>In line with government guidance, the Applicant will continue to work with communities and deliver meaningful, long-term, social, and economic benefits through local and strategic investment. Community benefit funding could be used to contribute towards PRoW infrastructure improvements identified by Suffolk County Council (SCC), if these are considered to be preferential to other suggested/potential improvements in the area.</p>

### 3. Applicant's Comments on the Late Submissions from Suffolk Energy Action Solutions (SEAS)

#### 3.1 Introduction

- 3.1.1 Table 3.1 summarises the Applicant's comments on SEAS Late Deadline 3 Submission [REP3-140] on the theme of cumulative effects.
- 3.1.2 Table 3.2 summarises the Applicant's comments on SEAS Late Deadline 3 Submission [REP3-141] on the theme of landscape and visual.
- 3.1.3 Table 3.3 summarises the Applicant's comments on SEAS Late Deadline 3 Submission [REP3-139] on the theme of socio-economics, tourism and leisure.
- 3.1.4 Table 3.4 summarises the Applicant's comments on SEAS Late Deadline 3 Submission [REP3-138] on the theme of traffic and transport.
- 3.1.5 Table 3.5 summarises the Applicant's comments on SEAS Late Deadline 3 Submission [REP3-137] on the theme of cultural heritage.

**Table 3.1 Applicant's comments on SEAS late deadline 3 submission [REP3-140]**

Reference	Matter	Point Raised	Applicant's Comments
1	Introduction	<p>The Applicant's reference to REP1A-043 does not address the substantive concerns raised in RR-5210. SEAS's core objections – that there remains no policy-compliant cumulative impact assessment; that foreseeable NSIPs are excluded from substantive assessment; that cumulative duration, lived experience and rolling impacts are unassessed; and that impacts are fragmented by topic and scheme – remain unanswered. No new evidence or analysis is provided to remedy those deficiencies.</p>	<p>Both the intra-project and inter-project cumulative effects assessments have been undertaken in line with best practice, including the PINS guidance on the assessment of cumulative effects. For inter-project effects assessment, the list of projects to be considered has been agreed with local planning authorities and has been based upon the latest information available at the time of the assessment. Duration has been a consideration throughout the assessment. Impacts are not fragmented – topics are brought together when considering, for example, potential intra-project effects on residential properties and Public Rights of Way (PROW), an issue that has been the subject of several discussions at Issue Specific Hearings. Further analysis of the potential for significant intra-project cumulative effects has identified that if such effects do occur, they are likely to be moderate at most. This assumes all sources of effect occur at the same time, even though this may not be the case, or would only occur infrequently. As such the Applicant does consider that the cumulative assessment is compliant with both policy and guidance.</p>
6	Introduction	<p>The Applicant answers a different question from the one SEAS raised. SEAS is not just treating the SPR ExA passages as a narrow LVIA precedent, but as evidence that this location has already been found to be highly constrained by cumulative energy infrastructure, requiring exceptional care when further major schemes are proposed. The WR's point is that, since EA1N and EA2, additional NSIPs – including Sea Link and the foreseeable LionLink project – materially change the cumulative context and therefore require a comprehensive, lawful and policy compliant cumulative impact assessment.</p> <p>The Applicant's assertion that effects are "already considered" and would be "little different" does not demonstrate that such an assessment has been undertaken. The fact that EA1N and EA2 had their own mitigations does not dispose of the need to assess the cumulative impact of Sea Link with those schemes, still less with LionLink. No integrated cumulative evaluation is</p>	<p>This is not an accurate characterisation of the Applicant's response.</p> <p>A comprehensive, and policy compliant assessment of cumulative effects with LionLink, EA1N and EA2 is already provided in <b>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]</b>.</p> <p>The potential inter-project effects associated with LionLink, including its proposed connection into the Friston (Kiln Lane) Substation, is being reviewed now that additional project information is available to support the LionLink statutory consultation. This information includes a proposal for an extension to the substation, though this is proposed for LionLink alone and is not required for Sea Link.</p> <p>It should be noted that the potential for extension of the substation to accommodate LionLink (then EuroLink) and Nautilus was discussed during the examination of EA1N and EA2 and that East Suffolk Council previously commented that "<i>There are unlikely to be any significant additional impacts on landscape character given that the extensions will be additions, to what will by then be, if consented, a substantial complex of industrial scale infrastructure</i>".</p>

Reference	Matter	Point Raised	Applicant's Comments
		provided that addresses the combined effects of multiple co-located NSIPs at this hub, as required by EN-1, EN-5 and the EIA regime	The Applicant has assessed the Suffolk Onshore Scheme, as it pertains to the Friston site, under two scenarios – one where the Friston substation is built under SPRs consent (Scenario 1) and one where the Friston substation is built under consent granted to the Proposed Project (Scenario 2). Both EA1N and EA2 are also considered in the assessment of inter-project cumulative effects as reported in <b>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]</b> . Significant inter-project cumulative effects on landscape character and visual amenity are reported with EA1N and EA2, LionLink, and South Saxmundham Garden Neighbourhood with these developments separately and together. Significant effects are also reported in respect of the cumulative loss of Best and Most Versatile agricultural land with Sizewell C Rail Improvements, EA1N and EA2, The Croft Farm land and buildings development and South Saxmundham Garden Neighbourhood, again both separately and together. These developments and others have been considered by other topics but have not been considered likely to have significant effects separately or together.
7-8		The Applicant's observation about the sequencing of the SPR ExA passages does not address SEAS's point: that the ExA found the local harm from the cumulative delivery of two EA schemes to be "substantial" and the outcome "only just sufficient on balance". SEAS relies on this as evidence that this location is already at the limits of acceptability for major energy infrastructure, such that the addition of further NSIPs demands a comprehensive cumulative assessment, which has not been undertaken.	Please see the above response which confirms that a comprehensive inter-project effects assessment has been undertaken for all " <i>other existing and, or approved development</i> " for which there was sufficient reliable information to undertake a satisfactory cumulative assessment. All other existing and, or approved development within 20 km of the Order Limits of the Proposed Project were included on the long list and agreed with the local planning authorities.
9		The Applicant's "as and when sufficient information becomes available" response does not engage with SEAS's point that additional major projects have already been identified and materially alter the cumulative context. SEAS is not asserting certainty about design detail; it is asserting that the existence of further NSIPs and major schemes now requires a lawful cumulative framework that can accommodate escalation in scale and concentration. Simply deferring consideration to an unspecified future point does not demonstrate that the present Application includes a comprehensive, policy-compliant cumulative impact assessment for the Proposals in their known and foreseeable context, particularly where the Applicant itself has acknowledged coordination with LionLink and has stated that statutory consultation material for that project will be available during the lifetime of this Examination, and indeed as of January 2026 is available. The fact that EA1N and EA2 were consented with their own mitigation does not dispose of the need to assess the cumulative impact of the Proposals with those schemes. Cumulative assessment is concerned with the combined effects of multiple developments in the same place, not with whether each project was, in isolation, mitigated to an acceptable standard	<p>The Applicant agrees that "<i>additional major projects have already been identified</i>" and has, in fact, assessed these 'additional major projects' in the inter-project cumulative effects assessment submitted with the application <b>[APP-060]</b>, based upon the information available at the time, or reasonable assumptions.</p> <p>As of 13 January 2026 additional information is now available for LionLink which, although it was considered in the original inter-project cumulative effects assessment, previously required many assumptions to be made in the absence of specific project information. This was only possible because of the likely similarity of the project to Sea Link and the proposal for a shared converter station site.</p> <p>The Applicant has committed to reviewing its previous assessment of cumulative effects with LionLink to test whether project information published in support of the statutory consultation for LionLink, which only commenced on 13 January 2026, are materially different from any of the previous assumptions used in the cumulative assessment of LionLink.</p> <p>It is standard practice in cumulative effects assessment to assess the residual effects reported for other existing and, or approved development, rather than assuming that none of the legally binding measures committed to by the project will be delivered. In fact, many Environmental Statements only provide detailed assessment of effects with committed mitigation in place. EN-1 supports this approach, stating that "<i>The cumulative impacts of multiple developments with residual impacts should also be considered</i>" (our emphasis).</p>
10		The Applicant's response merely refers back to its earlier reframing of the SPR ExA passages and does not engage with SEAS' point. SEAS is not inviting the Examining Authority to	Please see above responses that confirm that the cumulative effects assessment undertaken is entirely compliant with both policy and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, as well as PINS guidance on cumulative effects assessment.

Reference	Matter	Point Raised	Applicant's Comments
		treat those passages as determinative, but to recognise them as evidence that this location is already acutely constrained by cumulative energy infrastructure. The Applicant does not answer the WR's central argument: that, in this intensified context, a comprehensive and integrated cumulative impact assessment is required, and has not been provided.	
12	Multiple overlapping NSIPs have now been supplemented by yet further overlapping NSIPs, and other projects	The Applicant's referral to REP1A-043 does not engage with SEAS's point. Points 13–15 demonstrate that even where professional cumulative analysis has been undertaken (e.g. the PJA Report), it necessarily underestimates effects because the Applicant has failed to identify and assemble the full suite of overlapping projects. Mr Ellam's express warning that "numerous other smaller developments aren't included" is not answered. Deferring cumulative work on the basis that "details are not available" is precisely the structural flaw identified in the WR: it guarantees that cumulative impacts are systematically missed or downplayed, contrary to the requirements of law and policy	<p>PINS guidance confirms that the information to be gathered for the assessment of other existing and, or approved development, is to include:</p> <ul style="list-style-type: none"> <li>proposed design and location information;</li> <li>proposed programme of construction, operation and decommissioning; and</li> <li>environmental assessments that set out baseline data and effects arising from the other existing and, or approved development.</li> </ul> <p>Where such information is available for other existing and, or approved development within the zone of influence of the Proposed Project, the information has been assessed. Where such information is not available it is clearly not possible nor desirable for an Applicant to speculate about project information on behalf of the other existing and, or approved development.</p>
17		Citing general guidance does not demonstrate that these additional schemes have been incorporated into a coherent cumulative framework for this Application. The result remains that the Proposals are being examined on the basis of an incomplete and outdated cumulative picture	The Applicant is in the process of reviewing planning information to identify any new existing and, or approved development or where new information is available for development previously identified. The Applicant has committed to submitting the results of this review, and identifying if the updated information changes the findings reported in the existing inter-project cumulative effects assessment, by Deadline 5.
21	Breakdown of additional conflicting NSIPs, plus additional Housing and Major Road projects: Suffolk Water Recycling, Transfer and Storage (SWRTS) NSIP	Relying on a generic reference to "the Planning Inspectorate's advice on cumulative effects assessment" is not a substitute for producing a full, coherent and policy-compliant cumulative impact assessment for this Application. The guidance does not disapply the requirements of the EIA Regulations or NPS EN-1 and EN-5. It does not justify deferring the assessment of known and foreseeable cumulative schemes.	<p>The Applicant considers it to be entirely appropriate and reasonable to follow guidance developed by PINS specifically for the assessment of cumulative effects for NSIPs. The Applicant also considers that the cumulative effects assessment undertaken is entirely in accordance with policy as set out in EN-1, EN-3 and EN-5. EN-1 specifically references PINS advice note 17 (the original location of PINS guidance on cumulative effects), stating "<i>104 For guidance on the assessment of cumulative effects, see, for example, PINS Advice Note 17 regarding Cumulative Effects Assessment (August 2019)</i>"</p> <p>The need or otherwise to assess cumulative effects with other existing and, or approved development for which little or no information is available was considered in the Judicial Review by Lang J in her judgment on 13 December 2022 [EWHC 3177 (Admin)] in the case of SASES v. SoS, EA1N and EA2.</p> <p>The challenge was that two other developments- Nautilus and EuroLink (now LionLink)- should have been assessed as part of the cumulative effects assessment with EA1N and EA2, however very little information was available at the time for either development. Lang J concluded that:</p> <p><i>"I accept the submissions made by the Defendant and the Applicants that the approach taken by the Defendant did not constitute a breach of the EIA Regulations 2017. The developments in question were not "existing and/or approved projects" in respect of which a cumulative assessment would be required by reference to paragraph 5 of Schedule 4 to the EIA Regulations 2017"</i></p> <p>And</p> <p><i>"The two projects were at such an early stage that there was not sufficient reliable information to undertake a satisfactory cumulative assessment. That approach was in accordance with the guidance in Advice Note Seventeen."</i></p> <p>The reliable information available for the Helios Energy (Solar) Park project is similarly insufficient to allow any level of cumulative assessment. This project will be included in the updated long list of</p>

Reference	Matter	Point Raised	Applicant's Comments
	Helios Energy (Solar) Park NSIP	Relying on a generic reference to “the Planning Inspectorate’s advice on cumulative effects assessment” is not a substitute for producing a full, coherent and policy-compliant cumulative impact assessment for this Application. The guidance does not disapply the requirements of the EIA Regulations or NPS EN-1 and EN-5. It does not justify deferring the assessment of known and foreseeable cumulative schemes.	developments and will therefore have been considered in the update to the Cumulative Effects Assessment (CEA); however, it is highly unlikely to progress to stage four of the CEA due to a lack of suitable information.
25	Suffolk County Council Highways A12 improvements	The Applicant’s generic “as and when” response does not engage with SEAS’s identification of this specific scheme and the ways in which it overlaps spatially and functionally with the Proposals. SEAS is not inviting speculation about unknown development; it is pointing to a defined project that already alters the cumulative context. Reliance on future consideration does not demonstrate that this scheme has been incorporated into a lawful and policy-compliant cumulative assessment for this Application.	Please see response to point 21 above. In addition, we note that the A12 improvements construction peak (early 2027) would not overlap with construction peak of the Suffolk Onshore Scheme (2028). No trips are expected during assessed network or shoulder peaks. Fewer than 30 vehicles per hour during the other hours, based on levels outside of peak months. The forecast daily movements (102) represents a 1% increase through A12/B1121 Main Road (south) junction which has a weekday 12-hour baseline (2028) of 10,204 vehicles. Also, when the A12 works are being carried out, baseline flows on the A12 may be lower (due to potential disruption caused by works), so there could be an overall decrease (rather than increase) on the network at this time.
41	The South Saxmundham Garden Neighbourhood (SSGN)	The Applicant’s response to SEAS’s points 41–45 repeats the same deferral relied on elsewhere and does not engage with SEAS’s point that this is a defined, significant development likely to interact with the Proposals in the same locality. The existence of the South Saxmundham Garden Neighbourhood materially alters the cumulative context. Reliance on APP-060, which is a static, application-stage cumulative chapter based on an earlier and narrower project set, does not demonstrate that this known scheme has been incorporated into a coherent cumulative framework for this Application.	The Applicant is in the process of reviewing planning information to identify any new existing and, or approved development or where new information is available for development previously identified. The Applicant has committed to submitting the results of this review, and identifying if the updated information changes the findings reported in the existing inter-project cumulative effects assessment, by Deadline 5.
46-47	41-housing development at Benhall next to the 9 houses already situated at Shoots Meadow.	The Applicant explains why this land is no longer within the Order Limits, but that is not the entirety of the point SEAS raises. Points 46–47 are also concerned with the fact that a new, consented housing development now exists on land which the Applicant had proposed to use in connection with the Benhall Bridge solution. CR1-052 explains the technical basis for revising the Order Limits, but it does not assess how this additional development alters the local and cumulative context at Benhall, nor how its interaction with the proposed Bridge works will be experienced. The WR point therefore remains unanswered.	
53-54	NG ESO (now NESO) Connections Tec Register and Interconnector Register	SEAS’s point is that it has had to rely on the NESO Connections and Interconnector Registers to identify overlapping, sequential and adjacent projects which ought to form part of a lawful cumulative assessment. The Applicant’s response – that its cumulative project list in APP-060 was agreed with Suffolk County Council and East Suffolk Council – does not answer that point. Agreement with local authorities	The fact that a project is listed on the Tec register does not mean there is sufficient information to allow “ <i>satisfactory cumulative assessment</i> ” to be undertaken and the Applicant refers again to the judgment of Lang J which supports the Applicant’s view.

Reference	Matter	Point Raised	Applicant's Comments
		does not demonstrate that system-level, nationally significant projects identifiable from NESO registers have been captured, nor that the cumulative scope reflects the full and evolving project landscape. The WR concern, that the Application's cumulative framework is incomplete in what it brings into scope, therefore remains unanswered	
55		The Applicant's reliance on future projects to undertake cumulative assessment does not answer SEAS's point. Cumulative assessment cannot operate in only one direction. Where EA1N, EA2 and Sizewell C are consented and LionLink is now a defined NSIP, cumulative assessment with those schemes is capable of being undertaken now. Deferring that task to others does not demonstrate that this Application is supported by a lawful and policy-compliant cumulative impact assessment.	All of the other existing and, or approved developments listed by SEAS are already considered in the inter-project Cumulative Effects Assessment undertaken by the Applicant. The Applicant is currently reviewing the additional information published for LionLink on 13 January to consider whether it changes any of the cumulative effects with the project previously reported.
57-60	Lime Tree Energy Park - developer BNRG Langmead Ltd  Red House Farm – developer Cambridge Power Ltd  Manor Farm – developer Qair Renewables UK Ltd	SEAS's point is that a lawful cumulative assessment begins with accurate identification of the relevant projects. SEAS has demonstrated, using publicly available NESO registers, that additional overlapping and sequential schemes exist which are not captured in the Application's cumulative scope. The Applicant's response does not explain why those projects are omitted, nor does it dispute their existence. Even if full evaluation were deferred, failure to identify them at all evidences an incomplete and unreliable cumulative framework. The WR concern therefore remains unanswered.	The cumulative effects assessment was undertaken at a point in time and reflected the information publicly available on other developments at the time the ES was being produced. The Applicant is in the process of reviewing planning information to identify any new existing and, or approved development or where new information is available for a development previously identified. The Applicant has committed to submitting the results of this review, and identifying if the updated information changes the findings reported in the existing inter-project cumulative effects assessment, by Deadline 5.
65		The Applicant's response does not engage with SEAS's point. A "short list" figure in APP-093 is a static catalogue produced at application stage; it is not an integrated, up-to-date cumulative picture of how multiple major schemes overlap geographically and temporally in the same communities. SEAS's Appendix A is provided precisely because the cumulative context has evolved and the Examination now requires a clear, place-based view of that concentration, including schemes such as SWRTS which were not captured when APP-093 was prepared.	The Applicant is in the process of reviewing planning information to identify any new existing and, or approved development or where new information is available for a development previously identified. The Applicant has committed to submitting the results of this review, and identifying if the updated information changes the findings reported in the existing inter-project cumulative effects assessment, by deadline 5.

**Table 3.2 Applicant's comments on SEAS late Deadline 3 submission [REP3-141]**

Reference	Matter	Point Raised	Applicant's Comments
1	Introduction	The Applicant's reference to REP1A-043 does not address the substantive concerns raised in RR-5210. The issues identified by SEAS, understatement of landscape and visual harm, inadequate cumulative assessment, and structural weaknesses in the LVIA remain unresolved.	In light of recent discussions within Issue Specific Hearing 2 (ISH2) and Deadline 4 submissions relating to ISH2 and previous material ( <b>Application Document 9.87 (A) Applicant's Comments on First Written Questions [REP4-083]</b> , <b>Application Document 9.97 Applicant's Responses to Supplementary Agenda Additional Questions for Issue Specific Hearing 2 (ISH2) [REP4-094]</b> and <b>Application Document 9.90 (A) Applicant's Response to January Hearing Actions Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086]</b> ), as well as all previous responses to Landscape and Visual Impact Assessment (LVIA) related submissions made by SEAS, the Applicant has responded in full. The Applicant refutes that the LVIA is inadequate, understates effects or contains structural weaknesses as suggested by SEAS.
2	Introduction	<p>The Applicant's position is no longer tenable. NGV's January 2026 statutory consultation documents now provide a defined converter station envelope, indicative engineering layout, architectural massing studies, landscape masterplans, and a cumulative viewpoint sketch showing Sea Link and LionLink together. This directly contradicts the Applicant's claim that no usable information exists.</p> <p>Moreover, the Applicant already held sufficient indicative information, block massing from the Sea Link PEIR, footprints in APP-363, and the AS-064 envelopes to produce meaningful cumulative visuals long before NGV's PEIR.</p> <p>The ExA requested cumulative photomontages, not dotted lines. The continued absence of proper cumulative visualisations remains unjustified and undermines transparent assessment of landscape and visual effects.</p>	Cumulative visualisations have been prepared with LionLink within Appendix A LionLink Cumulative Visualisations contained within <b>Application Document 9.90 Applicant's Response to January Hearing Actions Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086]</b> . These were informed by the statutory consultation material from LionLink that was published in January 2026 as set out in Appendix A.
8	Why cumulative visualisations/ photomontages showing the LionLink converter station at Saxmundham are required	SEAS does not agree with the Applicant's position. The Applicant's reference back to REP1A-043 does not address the substance of SEAS's point.	
9	N/A	The Applicant's emphasis on corporate separation does not alter the factual position: National Grid Group plc has already confirmed co-location as the preferred and intended outcome, and both project teams have coordinated siting, layout and design. NGV's January 2026 statutory consultation documents explicitly show the two converter stations positioned together and include coordinated design material. The Applicant cannot rely on corporate separation to downplay co-location when the Group's own published material demonstrates a shared intention and coordinated approach.	Regarding updates on coordination with LionLink, Response to AP125 should be referred to as contained within <b>Application Document 9.90 (A) Applicant's Response to January Hearing Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) – Deadline 4 [REP4-086]</b> .
11-14	N/A	The Applicant's response does not address the core issue: the Applicant already possessed ample indicative information to produce meaningful cumulative visualisations, just as it did at PEIR stage when it generated block photomontages for three	Cumulative visualisations have been prepared with LionLink within Appendix A LionLink Cumulative Visualisations contained within <b>Application Document 9.90 (A) Applicant's Response to January Hearing Actions Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific</b>

Reference	Matter	Point Raised	Applicant's Comments
		converter stations. APP-363 provides clear indicative footprints, development zones and access arrangements for Sea Link + LionLink, and AS-064 adds further indicative parameters. These materials are no more “illustrative” than the information used to produce the Applicant’s own PEIR block massing. Moreover, NGV’s January 2026 statutory consultation documents now provide defined converter station envelopes, massing studies and a cumulative viewpoint sketch showing both converter stations together. The Applicant’s continued refusal to produce cumulative photomontages is therefore unjustified and leaves a significant gap in the LVIA.	<b>Hearing 2 (ISH2) – Deadline 4 [REP4-086].</b> These were informed by the statutory consultation material from LionLink that was published in January 2026 as set out in Appendix A.
15	N/A	While different projects may progress on different timelines, NGV’s statutory consultation material is now available, including defined envelopes and indicative layouts.	
17-18	N/A	See note 15. The information required to produce meaningful cumulative photomontages now exists, and the ExA’s request should therefore be met within the Sea Link examination timetable. .	
20	N/A	A procedural gap remains. Whatever the Applicant says about its “need” case, LionLink is central to it, yet the Applicant has not provided the cumulative visuals required to understand the combined effects. NGET’s claim at ISH1 that no LionLink model existed is now overtaken by events.	
22	N/A	SEAS maintains that the public was asked to engage with Sea Link without access to LionLink’s visual or environmental information. Now that NGV’s statutory consultation material is available, the cumulative visualisations requested by the ExA can and should be produced within the Sea Link examination timetable.	
23-26	Misleading public consultation and visual evidence	SEAS maintains that the public was presented with visuals that excluded LionLink, giving an incomplete picture of the true scale of development.	
N/A	N/A	SEAS maintains that the PINS guidance anticipates applicants working with the best information available at the time, including indicative design and location parameters where detailed data is not yet published. In any event, this debate is now academic: NGV’s statutory consultation material is available, providing defined envelopes and indicative layouts. The cumulative visualisations requested by the ExA can therefore now be produced within the Sea Link examination timetable.	
27-29	Landscape and visual harm from collocated infrastructure	SEAS maintains that the cumulative presence of two converter stations at Saxmundham would industrialise a highly sensitive rural landscape within LCA L1 and adjacent to the Suffolk Coast and Heaths National Landscape. The Applicant’s references to earlier documents do not alter this fundamental concern, nor do they address the absence of cumulative	

Reference	Matter	Point Raised	Applicant's Comments
		visualisations that would allow the ExA and the public to understand the full landscape impact.	
37-40	Conclusion	SEAS maintains that the absence of cumulative visualisations remains a serious flaw. The Applicant's reliance on ZTVs and professional judgement cannot substitute for the clear, visual evidence the ExA has explicitly requested. Now that NGV's statutory consultation material is available, including defined envelopes and indicative layouts, there is no remaining barrier to producing meaningful cumulative photomontages. These visuals are essential to understanding the real-world scale and combined landscape effects of two co-located converter stations. SEAS therefore reiterates that the application cannot be properly examined without them, and that revised cumulative visualisations should be required within the Sea Link examination timetable.	

**Table 3.3 Applicant's comments on SEAS late Deadline 3 submission [REP3-139]**

Reference	Matter	Point Raised	Applicant's Comments
	Tourism & Snape Maltings	Snape Maltings, with over 500,000 visitors p.a. is one of the largest tourist destinations in East Anglia. The only access to this destination is by road. NG contend that visitor attractions are only affected by development activity within a 500m buffer area. This cannot cover disruption to road access resulting in longer drive times to tourist destinations that will deter potential visitors.	A response to this issue regarding the impacts of the Proposed Project on Snape Maltings is set out in response to 1SERT6 in <b>Application Document 9.73 Applicants Response to First Written Questions [REP3-069]</b> . Section 10.9 of <b>Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]</b> assesses potential effects of the Proposed Project on private and community assets, recreation and tourism. The assessment considers impacts on these receptors within a 500 m study area from the Proposed Project's Order Limits. This is in line with the DMRB LA112 as 500 m is the distance threshold beyond which it is considered that people are likely to be deterred from making trips to an extent that they would change their habits. Where appropriate, receptors located beyond 500 m of the Suffolk Onshore Scheme have been included in the assessment to allow for assessment flexibility. The assessment concludes that there are no businesses or tourist attractions within the Study Area which would be significantly affected by the land required for the Suffolk Onshore Scheme or to which access would be required. Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] concludes there are no roads assessed that would experience significant severance effects during construction. The Applicant recognises that there is potential for noise, air quality, visual and traffic effects arising from construction of the Suffolk Onshore Scheme to impact on the amenity of residents, businesses, development sites, and users of open spaces and community facilities within, and beyond, 500 m of the Order Limits. This has been assessed in <b>Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]</b> . In light of the topic-specific conclusions identified and mitigation in place, no significant adverse effects on human health and wellbeing are identified. This includes no significant effects arising from construction in relation to community severance, air quality, landscape and visual or noise that would materially affect health and wellbeing outcomes.
12		SEAS wishes to emphasise that point that the core of the Suffolk (and especially the Suffolk Heritage Coast) tourism brand is about getting away from the rush and coming to an area of open skies and countryside, cultural and historic	<b>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects – Suffolk [APP-060]</b> sets out the assessment of the Proposed Project in combination with other cumulative schemes, including Sizewell C, in terms of both landscape and visual and socio-economics, recreation and tourism effects. Although Table 13.35 sets out that there is potential for

Reference	Matter	Point Raised	Applicant's Comments
16		<p>richness and small-scale villages and market towns with individuality. NG rebut the view that the combined energy developments will have a significantly detrimental effect on tourism during the development phase, and they state that all will be returned to normal post development. The evidence of the Applicant is highly contentious. They do not address the long-term effect of a change in image and perception that is inevitable because of some 12 years of the heaviest industrial development in Europe, the presence of massive industrial buildings in place of beach, open fields, woodland and all the nature that they support. This change of image, from recreational to industrial will not only affect the immediate locality but Suffolk which will lose one of the main contributors to its appeal to visitors. We contend that the Sea Link proposal is the key factor in tipping the balance. Arguably, Sizewell C, once built, will not change perception. The wholesale conversion of the Friston/Saxmundham area in addition to Sizewell C will undoubtedly do so. This deserves a detailed study.</p>	<p>residual significant cumulative effects on representative viewpoints, the Applicant does not believe this would materially impact the tourism industry in the long-term, either alone or in combination with other Nationally Significant Infrastructure Projects (NSIPs). The Applicant has undertaken a review of other NSIPs and their potential effects on tourism and visitor activity, as detailed in <b>Application Document 9.40 Visitor and Tourism Assessment Technical Note – Suffolk [REP3-065]</b>, and found that initial concerns observed in surveys have not translated into measurable reductions in visitor numbers or tourism-related employment.</p> <p>A full response to this issue regarding the impact of the Proposed Project on tranquillity, landscape and as a result tourism is set out in response to 1SERT1 in <b>Application Document 9.73 Applicants Response to First Written Questions [REP3-069]</b>.</p>
21	The Proposals and the Cumulative Threat	<p>The Applicant's comments, on a resident's example of a visitor who would not return because of the developments, are that they have used the same methodology for assessing economic impact as other NSIPs. This may be the case, but the result will depend on the inputs rather than the methodology. The Applicant also comments that there was no ill effect on tourism from Sizewell B or Hinkley Point. Sizewell B was a single development on a much smaller scale and Hinkley Point is again a single development and served by vastly superior access roads. In the Applicant's assessment, this methodology seems to carry more weight than the BVA research or Sizewell C's own research which suggested that 39% of visitors might be discouraged from returning. NG state that surveys such as these are "limited by methodological weaknesses".</p>	<p><b>Application Document 9.40 Visitor and Tourism Assessment Technical Note – Suffolk [REP3-065]</b> presents evidence from several Nationally Significant Infrastructure Projects (NSIPs) that there are no material impacts on tourism or visitor numbers.</p> <p>The Applicant considers these NSIPs to be appropriate comparators for the Proposed Project. Each of the cited projects are energy infrastructure developments located in sensitive coastal environments, including areas with high landscape, or environmental value such as National Landscapes, and are therefore relevant when considering potential effects on tourism and visitor assets.</p> <p>Sizewell C, Sizewell B and Hinkley Point C are substantially larger in scale than the Proposed Project and consequently represent a worst-case scenario, with a greater potential for construction and operational effects. In contrast, the Proposed Project is a much smaller scheme with a more limited construction workforce and duration and therefore has the potential for significantly fewer and more localised effects. Given the scale and location of these comparator schemes, their inclusion provides a conservative and appropriate benchmark for assessing the likely effects of the Proposed Project, which is expected to result in more limited impacts by comparison.</p> <p>The Applicant has reviewed the cited BVA research. As set out in Table 2.60 of <b>Application Document 9.34.1 (B) Applicant's Detailed Responses to Relevant Representations identified by the ExA [REP2-014]</b>, the results from the BVA research indicate that the majority of respondents from the survey undertaken said the developments would make no difference to their likelihood of visiting.</p>
		<p>In response to a point raised on cumulative traffic impact, the Applicant states there will be little overlap of project peaks and the residual effect cannot be considered significant. They continue to believe that their baseline of January &amp; February traffic is reasonable and seasonal variances immaterial despite a calculated uplift in seasonal traffic of some 30%. They fall back on "normal methodology for NSIPs" as being satisfactory in a heavily tourist location. They state that their baseline</p>	<p>The Applicant stands by the responses previously provided on these matters, including within Table 30.1 of <b>Application Document 9.36 Applicant's Comments on Other Submissions Received at Deadline 2 [REP3-064]</b>, and Table 2.57 of <b>Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]</b>.</p> <p>A comprehensive cumulative assessment of forecast traffic impacts of the Proposed Project and other projects on the Suffolk highway network has been undertaken within <b>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]</b>. This considers other major infrastructure projects such as Sizewell C, East Anglia ONE North Offshore Windfarm, East Anglia TWO Offshore Windfarm and LionLink based on the worst-case assumption that construction peaks of these different schemes would fully overlap. The</p>

Reference	Matter	Point Raised	Applicant's Comments
		figures are “appropriate and robust” and SEAS position is that they are neither.	assessment concludes that no significant cumulative effects are forecast on Traffic and Transport receptors when the Proposed Project is considered alongside other developments.
29	Consequences for Tourism and the Local Economy, and Recreation	The point raised is that the simultaneous construction of multiple NSIPs will overwhelm local infrastructure. The Applicant's response is that there will be no significant effect of accommodation provision and that GP patient ratio will remain broadly in line with the recommended provision. There is already a very evident effect on local housing rents and a transfer of hospitality provision from tourists to construction workers. Assuming a peak combined workforce of 12,000 this will double the population of the Saxmundham, Leiston and Aldeburgh area. It is hard to believe that these are the assumption that have generated the conclusion to which NG has arrived.	<p>The Applicant has conducted a robust EIA and is confident in its conclusion that there will be no significant inter-project cumulative effects on socio-economic, recreation and tourism receptors, including social infrastructure.</p> <p>The Applicant notes there are concerns regarding the potential for adverse impacts on local accommodation. <b>Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]</b> concludes that there are no significant effects anticipated on local accommodation capacity arising from the Suffolk Onshore Scheme. <b>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060]</b> also assesses the cumulative impact of the Proposed Project alongside other NSIPs, on local accommodation capacity. Under a worst-case scenario whereby the peak construction workforces of the cumulative schemes overlap, and all workers require accommodation, the chapter concludes that no significant effects are expected. As a result, no additional mitigation will be required.</p> <p>The Applicant is working closely with Sizewell C and Scottish Power Renewables (SPR) to explore ways that the impacts of construction workers traveling to site and staying in the local area could be minimised. The Applicant has had several meetings with Sizewell C, discussing the shared use of the Park and Ride Facilities being built by Sizewell C, the buses that they are providing for workers from Ipswich Train Station and any future initiatives they are planning. The types of construction workers used for the Proposed Project are more likely to stay in hotels within cities and large towns where they have access to other facilities based on experience from other National Grid projects.</p> <p>It is likely that the securing of the above points could be in the form of commitments in the REAC, the details of which will be discussed with the local planning authorities.</p> <p>The Applicant has reviewed the assessment of local accommodation and checked specific data sources and is submitting a further response in the form of <b>Application Document 9.117 Applicant's Response to AP104 from Issue Specific Hearing 2 at Deadline 4A</b> in relation to Action Point 104.</p>
36-38	Conclusions	The Applicant has failed to undertake any further research or adjust any of the assumptions made in their assessment of the impact of Sea Link alone or the combination of NSIPs. They simply refer to and reiterate their original proposal, ignore counter argument and refuse to consider alternate methodologies.	The Applicant has conducted a full assessment of socio-economics, recreation and tourism effects submitted as part of the EIA in <b>Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]</b> . The assessment methodology adopted by the Applicant is consistent with the approach adopted by comparable NSIPs. <b>Application Document 9.40 Visitor and Tourism Assessment Technical Note – Suffolk [REP3-065]</b> has been produced to support the assessment of visitor and tourism impacts associated with the Proposed Project and in response to concerns raised regarding potential adverse effects on visitor numbers, spending, and perception.

**Table 3.4 Applicant's comments on SEAS late Deadline 3 submission [REP3-138]**

Reference	Matter	Point Raised	Applicant's Comments
1-24	Introductory	REP1A-043 contains references to a total of 16 documents, of which 14 are the unmodified, original Application documents - principally APP-054, the Suffolk Chapter 7 on Traffic and Transport and APP-352, on PROW. The only new document references are to the Draft DCO, and to REP-110.	The original Application documents have been referred to as these are the documents that informed the DCO application from National Grid Electricity Transmission (NGET). The Applicant stands by the original Traffic and Transport cumulative assessment contained within <b>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]</b> which provides a comprehensive cumulative assessment of forecast traffic impacts of the

Reference	Matter	Point Raised	Applicant's Comments
		<p>REP1-110 itself consists largely of references to 9 original Application documents, whilst 'reviewing' earlier conclusions without any additional data.</p> <p>APP-060 is the original Suffolk Onshore Scheme Inter-project Cumulative Effects document.</p> <p>SEAS notes that only one new document with any new information has been submitted in response to the detailed representations made by SEAS; and that this document (REP1-110) consists of a desk review of inter-project effects that takes no account of the representations made. With this exception, no new rebuttal material and no recognition of or changes in response to representations have been made.</p>	<p>Proposed Project and other projects on the Suffolk highway network, based on the worst-case assumption that construction peaks of different schemes would fully overlap.</p> <p>Since the submission of the DCO application, <b>Application Document 9.26 Traffic &amp; Transport Cumulative Assessment (Suffolk) [REP1-110]</b> was produced following a meeting with Suffolk County Council (SCC) and East Suffolk Council (ESC) ESC on 6 August 2026, to provide the Local Authorities with further details on the methodology and findings of the original cumulative assessment work, including with respect to the forecast construction programmes and potential overlaps of different projects. The Technical Note is designed to allow SCC (as well as other stakeholders) to take a more informed view of the impact of cumulative construction traffic considering the Proposed Project and a number of local major development projects. This document supplements, and in no way replaces, the original traffic and transport cumulative assessment contained within <b>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]</b>.</p> <p>Following the preparation of the above, the conclusion remains that the peak construction phases for each scheme are planned to be staggered (between 2026 and 2030) and are therefore highly unlikely to all fully overlap. The duration of any potential effects of overlapping peak construction activity (third party scheme and the Proposed Project) will be limited to a few consecutive months and due to short-term temporary duration of any potential adverse impacts, the residual effect cannot therefore be considered as significant (duration of effect is a consideration identified in Paragraph 1.27 of the 2023 IEMA Guidelines for the Environmental Assessment of Traffic and Movement).</p>
15-30	Baseline Data	<p>SEAS notes that no new argument has been made to support the claims for the baseline data, and once more regrets that the Applicant seems unable to engage with any argument that conflicts with their original application.</p>	<p>The Applicant stands by its response on this matter (see Table 2.57 of <b>Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]</b>) and reiterates that the Baseline traffic flows which have informed <b>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]</b> are based on an agreed survey methodology with Suffolk County Council (as the Local Highway Authority) and are considered to be appropriate and robust for the purposes of the assessment work.</p>
1	Cumulative traffic impacts on rural roads.	<p>In one of the very few reactive documents submitted by the Applicant (9.26 Transport &amp; Traffic Cumulative Assessment [REP-110], 2.3.2-2.3.4), the claim is made that effects '..classified as either Negligible or Minor..' cannot become significant under any circumstances – no matter how many other 'negligible' effects may arise, or whatever the impact of other projects may be. This remarkable claim would be poorly received by the residents of Park Road, Benhall, which was made effectively inaccessible to police or ambulance vehicles by voluntary diversion traffic during the recent two-day closure of the A12 for SJC construction purposes. This is a road outside the study area but within the area quite clearly and seriously vulnerable to cumulative impact, but excluded from consideration in REP-110, 2.3.3 – '..there is considered to be no potential for a cumulative effect to arise when combined with other projects, including when combined with all cumulative schemes.'</p>	<p>The Applicant stands by the findings documented within <b>Application Document 9.26 Traffic &amp; Transport Cumulative Assessment (Suffolk) [REP1-110]</b> which provides further details on the approach to and findings of the original Traffic and Transport cumulative assessment of the Suffolk Onshore Scheme, as originally presented within <b>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]</b>. The assessment approach is consistent with previous EIA assessments made with reference to the IEMA Guidelines. As identified within <b>Application Document 6.2.1.5 Part 1 Introduction Chapter 5 EIA Approach and Methodology [APP-046]</b>, major and moderate effects are typically considered to be significant, whilst minor and negligible effects are considered not to be significant. Therefore, the findings within <b>Application Document 9.26 Traffic &amp; Transport Cumulative Assessment (Suffolk) [REP1-110]</b> are made on this basis.</p>
2	Baseline assessments	<p>REP1A-043: The majority of seasonal traffic (during summer months) is likely to be less peaked but would instead be expected to be spread across the day and <i>therefore less</i></p>	<p>The Applicant stands by its previous responses on this matter (see Table 2.57 of <b>Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]</b>), and that the Baseline traffic flows which have informed</p>

Reference	Matter	Point Raised	Applicant's Comments
		<p>taken in January and February.</p> <p><i>impactful</i> during the typical network and shoulder peak hours [our emphasis].</p> <p>No evidence for this assertion is to be found in the Application document, and no arguments apart from this statement have been advanced to counter the numerous, major concerns expressed both in Relevant Representations and OFH1 appearances from local residents and their representatives. NPPF 109, as quoted in APP-054 by the Applicant, outlines that ‘..transport issues should be considered from the earliest stages of plan-making and development proposals’; this should involve making transport considerations an important part of early engagement with local communities..’. These baseline concerns were raised throughout the consultation process, and yet there is no evidence that any serious consideration has been given to them from the start, nor that any will be represented in future DCO drafts.</p>	<p><b>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]</b> are based on an agreed survey methodology with SCC Highways and are considered to be appropriate and robust for the purposes of the assessment work.</p>
3	Engagement and agreement with stakeholders and consultees	<p>Application documents refer to agreements reached with various bodies including National Highways and Suffolk County Council Highways, and responses to Relevant and Written Representations repeat these claims unchanged. Where agreements have not formally been reached (for example with Suffolk Fire &amp; Rescue), agreement is claimed to be ‘embedded’ or ‘inherent’, or (cf 9.34.1, Detailed Responses to Relevant Representations, 2.15 Suffolk County Council) ‘..The Applicant will continue to engage with SFRS on an ongoing basis...’. The evidence however is that these agreements have not been substantive, as the example below indicate:</p> <p>National Highways [REP2-131, paras 4-5] refer to claims in the Transport Assessment Note: ‘ <i>The Applicant concludes in paragraph 7.3.9 that the Seven Hills Interchange does not need to be modelled as the large increases in traffic are expected to fall outside the peak hours (08.00-09.00 and 17.00-18.00). Further, the TA notes (in paragraph 7.3.11) that “since the trips on the SRN are less than on the LRN and as the effects on the LRN are shown to be not significant there will be no significant impacts on the SRN”. Notwithstanding these points, National Highways seeks further, evidenced assurance from the Applicant that the SRN in this location will not be adversely impacted by construction traffic arising from the development. The interchange is already congested and an increase in movements of approximately 100 vehicles, even in the peak shoulders, could be material. The Applicant is also asked to consider the cumulative impact at the junction, with other planned developments in this location and the proposals for a significant highway improvement of the A12, which would include amendments to the junction, and could be built to a similar timescale as the development. The A12 scheme is</i></p>	<p>The Applicant stands by its previous response on this matter, and that the Applicant will continue to commit to engage with SFRS on an ongoing basis. As set out in response to the Examining Authority’s Written Question 1GEN3 within <b>Application Document 9.73 Applicant's Responses to First Written Question [REP3-069]</b> during the development of the Proposed Project design, the Applicant has considered the relevant stakeholders in order to understand the Proposed Project’s impacts on emergency services (e.g. Suffolk Fire and Rescue Service, East of England Ambulance Service and Suffolk Constabulary). The Applicant will continue to liaise with the emergency service providers on any issues, working collaboratively with them on issues such as road closures or the movement of Abnormal Indivisible Loads (AILs), where additional resource is required, such as the escort of AIL vehicles, the Applicant is liaising with the relevant authorities on providing financial support to increase resources.</p> <p>Ongoing engagement regarding these matters is documented within <b>Application Document 9.23 Draft Statement of Common Ground Between National Grid Electricity Transmission and the Suffolk County Council [REP3-062]</b>, which is being updated further for submission at Deadline 5.</p> <p>The Applicant held a meeting with National Highways on 12 December 2025 to address the comments raised within <b>Application Document National Highways Deadline 2 Written Submission [REP2-131]</b>. The meeting reviewed the potential impacts of the Suffolk Onshore Scheme on the Strategic Road Network (SRN) in greater detail, including for the A12/A14 Seven Hills Interchange, and the portion of the A14 south of Ipswich. National Highways subsequently agreed that the Suffolk Onshore Scheme would not be expected to have a material impact on the SRN based on the information presented during the meeting. The agreed meeting minutes and presentation were subsequently shared with National Highways to document this position. The agreed meeting minutes will be appended to the next revision of <b>Application Document 6.3.3.7.A ES Appendix 3.7.A Transport Assessment Note [APP-175]</b> and <b>Application Document 6.3.2.7.A ES Appendix 2.7.A Transport Assessment Note [APP-122]</b> which will be updated to include results of the junction modelling requested by the Examining Authority.</p>

Reference	Matter	Point Raised	Applicant's Comments
		<p><i>being promoted by Suffolk County Council and is currently at the consultation stage of a planning application."</i></p> <p>Suffolk County Council also, in their lengthy Relevant Representation section on Traffic &amp; Transport, note several defects in the Traffic Assessment Note – for example 'Routes such as the A12 and A1094 are subject to seasonal fluctuations due to events, tourism and agricultural activities which has not been acknowledged in the assessment.' The Applicant 9.34.1 (B) at Table 2.9, para 81 [Rep1-111, now replaced by REP1-043], simply repeats the now familiar claim that the baseline traffic flows used '<i>...are based on an agreed survey methodology with SCC Highways and are considered to be appropriate for the purposes of the assessment work. For example, had higher baseline traffic flows been adopted to consider seasonal fluctuations during the summer, then the percentage increases as a result of forecast construction traffic associated with the Proposed Project would have been lower than what was reported and assessed for most of the assessment criteria.</i>'</p>	<p>The Applicant stands by its previous responses on this matter, and has responded to SCC's RR on Traffic and Transport within Table 2.9 of <b>Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]</b>, as well as further comments raised by SCC within their Local Impact Report (LIR) within Table 9.1 of <b>Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]</b>.</p>

**Table 3.5 Applicant's comments on SEAS late Deadline 3 submission [REP3-137]**

Reference	Matter	Point Raised	Applicant's Comments
5-12	Friston Neolithic Hengiform Monument and Wider Archaeological Landscape	<p>This response misapplies national policy and understates the issue for three reasons:</p> <p>1) Significance cannot be downgraded procedurally. The Applicant relies on interim consultation conclusions recorded in a draft Statement of Common Ground.</p> <p>This does not displace the earlier position of Suffolk County Council Archaeological Service and Historic England that the feature was of exceptional rarity and potentially schedulable. The examination is not a mechanism for retrospectively redefining significance to suit routing convenience</p> <p>2) The policy test is not limited to schedulability EN-1 paragraph 5.9.6 extends the highest level of protection to non-designated heritage assets of equivalent significance, including archaeological remains of demonstrable importance. The presence of a large ceremonial enclosure within a rich prehistoric landscape clearly triggers this test, regardless of whether final scheduling occurs.</p> <p>3) Preservation in situ vs. excavation has not been justified. The Applicant assumes that full excavation is an acceptable mitigation. EN-1, the NPPF and established archaeological practice make clear that preservation in situ is the preferred option for highly significant remains. Excavation is not neutral mitigation; it is loss</p>	<p>Geophysical survey undertaken across the G-Shaped enclosure near Friston, as well as the area of Change Request 1, has confirmed the extent of the feature (Application Document <b>9.76.5.2 Change Request Appendix B Geophysical Survey Report [CR1-057]</b>), and stakeholders including Historic England (<b>Written Representations (WRs) relating to Change Request 1 [REP3A-021]</b>) and Suffolk County Council (<b>Written Representations (WRs) relating to Change Request 1 [REP3A-031]</b>) have both confirmed that the asset is not a henge and is no longer considered to be of National Significance. This is not 'significance being downgraded procedurally', it is the result of an established phased process of research where our understanding of the asset and significance has evolved as new information has come to light.</p> <p>Evaluation excavations in the area of Change Request 1 have now been undertaken, and the interim report was submitted at Deadline 4 (<b>Application Document 9.114 Interim Phase 3 Archaeological Report Suffolk</b>). This confirmed that no remains of national significance survive within the area of Change Request 1.</p> <p>As such, stakeholders have agreed that physical impacts on the G-Shaped enclosure or the area of Change Request 1 could be mitigated through archaeological excavation (<b>Written Representations (WRs) relating to Change Request 1 [REP3A-031]</b>).</p>

Reference	Matter	Point Raised	Applicant's Comments
		<p>SEAS therefore maintains that the Environmental Statement remains incomplete, as routing decisions are still being taken before the archaeological significance and context are fully understood.</p> <p>The Applicant's comments confirm that:</p> <ul style="list-style-type: none"> <li>additional evaluation trenching was still ongoing in November– December 2025, and</li> <li>revised assessments would be published “prior to the end of examination”</li> </ul> <p>This admission reinforces SEAS’ central point: routing decisions and Order Limits changes are being advanced without a settled evidence base.</p> <p>The Examining Authority itself has recognised this risk in its Rule 9 letter, requiring further archaeological work and justification of route selection. The Applicant’s response does not meet that requirement.</p> <p>Proceeding on the basis of incomplete data is contrary to:</p> <ul style="list-style-type: none"> <li>the precautionary principle,</li> <li>the Infrastructure Planning (Decisions) Regulations 2010, and</li> <li>the integrity of the DCO process</li> </ul>	
13	Cultural landscapes	<p>Applicant’s response is narrowly technical and fails to meet policy requirements for understanding cultural landscapes</p> <ul style="list-style-type: none"> <li>Archaeology cannot be assessed in isolation from historic landscape character.</li> <li>Limiting assessment to individual features ignores EN-1 requirements to understand significance and setting holistically</li> </ul>	<p>Impacts on heritage assets were assessed in the original DCO submission (<b>Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]</b>) and both Suffolk County Council (<b>Responses to ExQ1 [REP3-071]</b>) and Historic England (<b>Responses to ExQ1 [REP3-089]</b>) have agreed that all relevant assets were assessed.</p> <p>A review of the assessment of Historic Landscape Character will, however, be undertaken for Deadline 5.</p>
21-25	Harm to designated heritage assets	<p>National Grid deflects SEAS’ concerns about harm to designated heritage assets by referring back to Appendix A of Document 9.34.1 and to interproject cumulative assessments which conclude “no significant cumulative effect”</p> <p>As demonstrated in SEAS’ detailed counter-response to Appendix A, this position is flawed because:</p> <ul style="list-style-type: none"> <li>the Applicant relies on EIA significance thresholds rather than EN-1’s “great weight” test;</li> <li>setting is treated largely as a visual screening exercise;</li> <li>cumulative effects of three colocated converter stations are acknowledged in principle but not robustly assessed in heritage terms;</li> </ul>	<p>Paragraph 7.5.7 of <b>Application Document 7.1 (C) Planning Statement [AS-057]</b> acknowledges the ‘great weight’ that should be afforded to the conservation of heritage assets in the decision-making process and proceeds to outline the harms to heritage assets that should be weighed against the public benefits of the Proposed Project. Assets with identified significant effects in the Cultural Heritage chapter of the ES (<b>Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]</b>) are individually named in the Planning Statement (<b>Application Document 7.1 (C) Planning Statement [AS-057]</b>), however all assets with effects are considered as stated in Paragraph 7.5.32.</p> <p>An updated assessment of the cumulative effects of the Suffolk Onshore Scheme has been provided at Deadline 4 in <b>Application Document 9.90 (A) Applicant’s Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) – Deadline 4</b>. This concludes that there will be no cumulative effects resulting from the Suffolk Onshore Scheme in combination with other developments.</p>

Reference	Matter	Point Raised	Applicant's Comments
		<ul style="list-style-type: none"> <li>the Fromus Valley bridge and permanent access are recognised as the main source of harm, yet are treated as inevitable rather than avoidable.</li> </ul> <p>The Applicant's own Coordination Document confirms capacity for up to three converter stations at Saxmundham. Assessing Sea Link "in isolation" is therefore unrealistic and policy-non-compliant.</p>	
26-29	Policy context and legal tests	<p>The Applicant selectively quotes EN-1 paragraphs 5.9.6, 5.9.27 and 5.9.28 to suggest alignment with policy, while failing to apply them in practice.</p> <p>SEAS agrees with the policy wording cited, but notes that:</p> <ul style="list-style-type: none"> <li>"clear and convincing justification" for harm has not been provided;</li> <li>alternatives (including routing and siting alternatives) have not been demonstrated;</li> <li>cumulative harm has not been properly weighed;</li> <li>excavation is treated as mitigation without justification against preservation in situ. The Applicant's response therefore acknowledges the correct policy tests while failing to meet them.</li> </ul>	<p>To the extent that there is harm to designated heritage assets, and that this harm is less than substantial, the Applicant's view is that this should be weighed against the public benefits of the Proposed Project, consistent with Paragraph 5.9.32 of the 2023 NPS EN-1. These public benefits are set out in the Planning Statement <b>[AS-057]</b> and include meeting the 'urgent' and 'critical' need to bring forward low carbon infrastructure to meet targets for decarbonisation and net zero. The Applicant's view is that there is a clear and convincing justification for the less than substantial harm that has been identified to heritage assets.</p> <p>To the extent that there is a policy test to demonstrate alternatives, the Applicant does not accept that alternative routing and siting have not been considered and assessed.</p> <p>As set out above, the Applicant considers that cumulative harm has been fully and properly assessed,</p> <p>As set out above the archaeological mitigation has been agreed with stakeholders who have confirmed that physical impacts on the G-Shaped enclosure or the area of Change Request 1 could be mitigated through archaeological excavation, the asset is not of national significance and therefore there is no policy requirement to preserve it in situ (<b>Written Representations (WRs) relating to Change Request 1 [REP3A-031]</b>).</p>
31	Cumulative setting	<p>The Applicant continues to assert that cumulative visualisations for Sea Link and LionLink are addressed elsewhere or are not required, despite SEAS providing indicative visuals demonstrating that such assessment is feasible.</p> <p>Without cumulative visual evidence, the Examining Authority cannot lawfully discharge its duty to assess impacts on the setting of:</p> <ul style="list-style-type: none"> <li>Grade II Listed Hurts Hall,</li> <li>Saxmundham Conservation Area,</li> <li>Grade II* Listed St John the Baptist Church, and</li> <li>Grade II Listed Wood Farm</li> </ul> <p>The absence of this material remains a material deficiency.</p>	<p>Cumulative Visualisations depicting the Suffolk Onshore Scheme and Lionlink have been provided at Deadline 4 in <b>Appendix A of Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2)</b>. These include Viewpoints 5 and 21 for the assessment of effects to Hurts Hall, Saxmundham Conservation Area, the Church of St John the Baptist and Hill Farmhouse. Wood Farm has been delisted since submission of the application and is no longer assessed as a designated asset, however cumulative viewpoint 1 in <b>Appendix A of Document 9.90 Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2)</b> demonstrates both schemes in the vicinity of that asset which is a potential non-designated heritage asset. An updated assessment of Wood Farm will be provided at Deadline 5.</p>
33	Requests for actions	<p>For the reasons above, SEAS reiterates its requests that the Examining Authority:</p> <ul style="list-style-type: none"> <li>require a revised archaeological assessment incorporating full evaluation of the Friston enclosure and its wider landscape context;</li> <li>defer acceptance of corridor amendments until investigations are complete;</li> </ul>	<p>Please see responses above.</p> <p>It is also noted that additional clarifying assessments have been provided in response to the Examining Authority's first written questions related to scoped out heritage assets in <b>Application Document 9.73 Applicant's Responses to First Written Questions [REP3-069]</b> and Appendix F of <b>Application Document 9.73.1 Applicant's Responses to First Written Questions – Appendices [REP3-070]</b>. Further clarifying assessment has also been provided on scoped out</p>

Reference	Matter	Point Raised	Applicant's Comments
		<ul style="list-style-type: none"> <li>• require a landscape-scale cultural heritage reassessment of the Friston– Snape–Saxmundham corridor;</li> <li>• require cumulative visualisations of Sea Link and LionLink in heritage context;</li> <li>• treat the omissions identified as material deficiencies; and</li> <li>• conclude that consent should not be granted unless the proposals are re-sited or fundamentally redesigned.</li> </ul>	<p>heritage assets, scoped in heritage assets, cumulative impact assessment and assessment of assets in the Friston area in the absence of EAN1/EA2 Schemes (i.e. scenario where Friston substation is built as part of the Proposed Project) in <b>Application Document 9.90 Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) – Deadline 4</b>.</p>
34	Conclusions	<p>National Grid's comments in Table 2.35 and Document 9.34.1 do not resolve the substantive issues raised in SEAS' Written Representation. They rely on procedural deflection, selective policy citation, and premature conclusions drawn from incomplete evidence.</p> <p>SEAS submits that the Environmental Statement remains incomplete and unreliable in cultural heritage terms. The Examining Authority should therefore afford limited weight to the Applicant's responses and require further work before any lawful decision can be made.</p>	
Annex A	Visualisations	<p>Cumulative visualisations are feasible and necessary. The Applicant's position is no longer tenable. NGV's January 2026 statutory consultation documents now provide a defined converter station envelope, indicative engineering layout, architectural massing studies, landscape masterplans, and a cumulative viewpoint sketch showing Sea Link and LionLink together. This directly contradicts the Applicant's claim that no usable information exists.</p>	<p>Please see response to reference 31 above.</p>

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